

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ROBERT JULIAN-BORCHAK WILLIAMS,

Plaintiff,

Case No. 21-cv-10827

v.

Hon. Laurie J. Michelson

CITY OF DETROIT, a municipal corporation,
DETROIT POLICE CHIEF JAMES CRAIG, in
his official capacity, and DETECTIVE
DONALD BUSSA, in his individual capacity,

**PLAINTIFFS’
PRELIMINARY LAY
WITNESS LIST**

Defendants.

Michael J. Steinberg (P43085)
Ben Mordechai-Strongin*
Lauren Yu*
Jonathan Barnett*
William Ellis*
Michael Terlep*
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*Student Attorney practicing pursuant to Local
Rule 83.21

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PLAINTIFFS' PRELIMINARY LAY WITNESS LIST

1. Atkinson, Benjamin
2. Adams, Levan
3. Ali, Alaa M.
4. Burton-Harris, Victoria
5. Bussa, Donald
6. Chadwick Bills, Angelique
7. Coulson, Jennifer
8. Cox, Rodney
9. Craig, James
10. Dinkfelt, Shawn
11. Elijaafari, Rana
12. Garcia, Lawrence
13. Gillis, Jane
14. Graveline, Christopher
15. Howard, Krystal
16. Irvin, Chimene
17. Jackson, Michael

18.Jackson, Omari

19.Johnston, Katherine

20.Kozloff, Barbara

21.McIntosh, Russell M.

22.Phillips, Hannah

23.Posey, Stevie

24.Ratkowski, Scott

25.Ronan, James

26.Saati, Ray

27.Salem, Mohammed

28.White, James

29.Yager, Rathe

30.Any official involved in reviewing or approving the arrest warrant against
Plaintiff Robert Williams.

31.Employees of the Detroit Detention Center

32.Any and all individuals who were present at the Detroit Detention Center
while Plaintiff Robert Williams was incarcerated there

33.Employees of Shinola/Detroit, LLC and any and all of its retail branches

34.Employees of Mackinac Partners and its parent company, Accordion
Partners LLC

35. Employees of the Detroit Police Department
36. Employees of the Farmington Hills Police Department
37. Employees of the Wayne State University Police Department
38. Employees of the City of Detroit.
39. Employees of the Wayne County Prosecutor's Office.
40. Employees of the Michigan State Police.
41. Employees of DataWorks Inc.
42. Employees of Rank One Computing
43. Employees of NEC Corporation
44. Members of the Detroit Board of Police Commissioners
45. Neighbors of Plaintiff Robert Williams.
46. Coworkers of Plaintiff Robert Williams.
47. Family members of Plaintiff Robert Williams, including but not limited to
Melissa Williams, J.W., and R.W.
48. All witnesses listed by Defendants.
49. Any and all necessary rebuttal and impeachment witnesses.
50. All necessary records custodians.
51. All witnesses identified in interrogatories and depositions and throughout
discovery.
52. All necessary rebuttal expert witnesses.

53. Plaintiff reserves the right to amend and supplement his witness list as discovery continues.

54. In the event that any documentary evidence is submitted into evidence, Plaintiff may call as a witness any individual concerned with such documents, such as the author of the document, the person to whom the document was addressed, the recipient of the document or copies of the document, and/or persons referred to in the document.

Dated: October 11, 2022

Respectfully submitted,

/s/ Michael J. Steinberg
Michael J. Steinberg (P43085)
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Lauren Yu*
Jonathan Barnett*
William Ellis*
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